# EXHIBIT A

Case 1:23-mi-99999-UNA Document 4186-4 Filed -C15 Page 1

IN THE SUPERIOR COURT OF COBB COUNTY STATE OF GEORGIA

Connie-Toulor Clerk of Superior Court Cobb County

Civil Action File Number

DOMESTIC RELATIONS STANDING ORDER

The Parties to this action, as well as their agents, employees and all other persons acting in concert with the Parties are subject to the following provisions:

- If this case involves a question of child custody (excluding contempt actions), except by agreement of the parties or Court Order, you shall not cause or permit the minor child(ren) to be removed from the State of Georgia. However, this provision does not preclude the parties from taking the minor child(ren) on a vacation or family trip, not exceeding fourteen (14) days, inside the United States, so long as the opposing party is provided with thirty (30) days advanced notice and a travel itinerary that includes where the child(ren) will be spending the night. Customary activities/events such as camp attendance, sporting events and other extracurricular activities involving the child(ren) shall also serve as exceptions to the restraints concerning removal of the children from the State of Georgia.
- You shall not do, attempt to do, or threaten to do any act which injures, maltreats, vilifies, molests, or harasses or which may, upon judicial determination, constitute threats, harassment, or stalking of the adverse Party or the child(ren) of the Parties or any act which constitutes a violation of other civil or criminal
- You shall not sell, encumber, trade, contract to sell, or otherwise dispose of or remove from the jurisdiction of the court, without the permission of the Court, any of the property belonging to the Parties except in the ordinary course of business or except in an emergency which has been created by the other Party to the action.
- You shall not disconnect or cause to be disconnected any utility-providing service to the home of the other Party. You shall not change, cause to change, cancel, or cause the cancellation of any insurance presently in effect which protects the Parties or any of their children or property. You shall not interfere with the other Party's mail.
- You must attend the Seminar for Divorcing Parents. If you would like more information about the Seminar, please see this Court's Standing Order Establishing Seminar for Divorcing Parents or contact the ADR Office at 770-528-1812.
- If you are a self-represented litigant or become self-represented and do not have counsel, you must attend the Family Law Workshop within 45 days. Contact the ADR Office at 770-528-1812 to make arrangements to attend.
- If a Guardian Ad Litem has been appointed, then counsel for the parties to the action, and anyone acting in concert with counsel, shall not communicate with or meet with the parties' minor children regarding the pending litigation without first securing the written consent of the Guardian Ad Litem.
- You must provide the following documentation to this Court by filing it with the Clerk:
  - If this case involves financial issues such as child support, alimony, division of property, allocation of debt, or contempt of a court order addressing these issues, then you must file your Financial Affidavit/Statement as required by Uniform Superior Court Rule 24.2 with the Clerk at least 5 days before the scheduled hearing, mediation or other alternative dispute resolution proceeding.
  - If this case involves child support or child custody, then you must file your Child Support Worksheet and the schedules thereto as required by Uniform Superior Court Rule 24.2 with the Clerk at least 5 days before the scheduled hearing, mediation or other alternative dispute resolution proceeding.
  - If this case involves an action for contempt of a previous court order or an action for modification of custody, visitation, child support, or alimony, then you must attach copies of all prior orders which you seek to enforce or modify to your initial pleadings.
  - If there has been a change in your income, employment, debts, assets, or other relevant financial circumstances since you filed a previous Financial Affidavit/Statement or Child Support Worksheet, then you must file with the Clerk and serve upon the opposing Party updated versions of either or both of those documents at least 5 days before the next scheduled hearing, mediation or other alternative dispute resolution proceeding.
- You must bring the following documents to each hearing in this case:
  - Documents reflecting your current income, including but not limited to a copy of your most recent paystub as well as state and federal income tax returns, W-2 forms, and 1099 forms from the last three years.
  - If this case involves child support, documents from your employer or insurance company showing how much you pay for health, dental, and vision insurance for the children at issue and health insurance cards for yourself and the children at issue. If possible, these documents should show how much you pay for insurance for each child.
  - IMPORTANT NOTICE If any documents that you plan to file or bring to court contain social security numbers, taxpayer identification numbers or financial account numbers, you must redact those numbers by marking out all but the last four digits. Additionally, any documents containing a date of birth must be redacted so that only the year of birth is visible.
- If you fail to comply with the provisions of this Order, then you may be sanctioned by or held in contempt of this Court.
- This serves to put the parties on notice that the Court may rely on evidence introduced at any temporary hearing in making its final custody determination. Pace v. Pace, 287 Ga. 899 (2010).

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Superior Court Judge Cobb Judicial Circuit

# Case 1:23-mi-99999-UNA Document 4186-4 Filed 12/15/23 Page 3 of 13/2023 13:15:26 General Civil and Domestic Relations Case Filing Information Form 1 55844-C V

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# DISCLOSURE STATEMENT **CLERK OF SUPERIOR COURT**

Connie Toulor Clerk of Superior Court Cobb County

CASE NUMBER 23-1-8815-71  Assigned by Clerk  LORENTO E. CLEMENT Kingoth Monta  Plaintiff  Vs.  CSC of Cobb County Inc. ETAL  Defendant
TYPE OF ACTION  1. Divorce without Agreement Attached 11. URESA 2. Divorce with Agreement Attached 12. Name Change 3. Domestic Relations 13. Other 4. Damages Arising out of Contract 14. Recusal 5. Damages Arising out of Tort 15. Adoption 6. Condemnation 7. Equity 8. Zoning- County Ordinance Violations (i.e. Injunctive Relief-Zoning) 9. Zoning Appeals (denovo) 10. Appeal, Including denovo appeal- excluding Zoning
PREVIOUS RELATED CASES  Does this case involve substantially the same parties, or substantially the same subject matter, or substantially the same factual issues, as any other case filed in this court (Whether pending simultaneously or not)?
YES- If yes, please fill out the following:  1. Case #
Jora o a Co Augusty Joseph Attorney or Party Filing Suit

# IN THE SUPERIOR COURT OF COBB COUNTY **STATE OF GEORGIA**

Petitioner: LONENTO E. CLEMENT	Clerk of Sur <b>Eட</b> ்சுற் Court Cobb Cou
Respondent: CSC of Ce be Cocurby	Civil Action File No.: 33-1-8815-71
SU	JMMONS
TO THE ABOVE NAMED RESPONDENT:	
You are hereby summoned and required to fi	ile with the Clerk of said Court and serve upon the Petitioner,
whose name and address is:  GGO SAG  ATCANTA CA  LONENTO É. CC	BLE VIEW LN A 30349 EMENIT / KEN MONTON
exclusive of the day of service. If you fail to do so, judgmented the Complaint.	on you, within 30 days after service of this Summons upon you, ment by default will be taken against you for the relief demanded in is case, you must appear at that scheduled hearing, regardless of
This 13th day of 40VEMS	EL, 20 Z3.
	CONNIE TAYLOR,
	Clerk of Superior Court  By Olympian Smith
	By Deputy Clerk
To Respondent:	
This Complaint and Summons was served upon you,	, 20

# Case 1:23-mi-99999-UNA Document 4186-4 Filed 12/15/23 Page 6 of 13

### SHERIFF'S ENTRY OF SERVICE

Marietta, Georgia

**COBB COUNTY** 

į	Superior Court □ State Court □	SERVE
	Attorney's Address Pro SE LCRENZO E. CLEMENTY L. GGO SABLE VILW LN ATLANTA, GA 30349	· Merrin
	Name and Address of Party to be Served	Civil Action No. 33-1-3815-71  Date Filed N-13-2003  LORENZO E. CLUMENT  Plaintiff  VS. S. S
	Garnishee	Defendant
	I have this day served the defendant of the within action and summons.	personally with a cop
	I have this day served the defendant a copy of the action and summons at his most notorious place of about Delivered same into hands of weight, about pounds; height, about feet and	described as follows age, about years
់់់្ញ្	by leaving a copy of the within action and summons with	a corporation a corporation
	I have this day served the above styled affidavit and summons on the premises designated in said affidavit, and on the same day of such Mail, First Class in an envelope properly addressed to the defendant affixed thereon containing notice to the defendant(s) to answer said states.	n posting by depositing a true copy of same in the United State (s) at the address shown in said summons, with adequate postage
	Diligent search made and defendantnot to be found in the jurisdiction of this Court.	
	This day of	DXASChell.
	SHERIFF DOCKET PAGE	DEPUTY  OSOS  COBB COUNTY, GEORGIA

WHITE: Clerk

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CANARY: Plaintiff Attorney

PINK: Defendant

CLERK OF SUPERIOR COURT COBB COUNTY, GEORGIA

23108815

# IN THE SUPERIOR COURT OF COBB COUNTY STATE OF GEORGIA

DEC 04, 2023 11:01 AM

Connie Taylor, Clerk of Superior Court
Civil Action File No.

33-1-8815 -71

LORENZO E. CLEMENT and KEN MORTON, Petitioner,

CSC OF COBB COUNTY, INC., and

v.

Respondent.

HOOD CLAYTON,

Calendar Call Order

day of Tanvary, 20 34 at 9:00 (AM)PM in

The above-styled case is hereby set for Hearing on Complaint for an in-person calendar call on the

(	Courtroom 6300, Cobb County Superior Court, 70 Haynes Street, Marietta, Georgia 30090. The calendar					
•	will be recast for cases to be heard during the remainder of the week and the week after.					
All Parties must appear at the calendar call. Failure to appear could result in adverse consequences. The Clerk shall add this hearing to a published calendar.  SO ORDERED this						
-	Certificate of Service  I certify that when the foregoing document was filed with the Clerk of Superior Court, copies of the document were hand-					
(	delivered, emailed, served via PeachCourt electronic service, or placed into the Court's mail system (to be mailed via United States mail or interdepartmental mail) to					
<u>.</u> - -	Lorenzo E. (lement (SC of Cobb County)  10renzo . (lement@yahop.com)  Ken Morton  Planetics 46@gmail.com  Marietta, CA 30060					
	Clayton					
logis	tics LLC, Certified by Court Staff					
014	Vine Street					
	oger Co.					
Cincia	mati, QH 4520-1100 USA					



Lorenzo E. Clement, And Ken Morton, Plaintiffs,

VS

Civil Action: 22 - |-88| 5 - 71

CSC of Cobb County Inc. 192 Anderson St. SE, Suite 125 Marietta, Ga 30060: County: Cobb

Hood Clayton
Logistics LLC
1014 Vine St
The Kroger Co.,
Cincinnati, Oh 4520-1100 USA
Defendants

# Kroger Claim Racial Profiling By Kroger Management And Security

COMES NOW Plaintiff Lorenzo E Clement and Ken Morton, stating a complaint against Defendant The Kroger Co., as follows:

1.
PARTIES AND JURISDICTION

Plaintiff Lorenzo E Clement Plaintiff Ken Morton

2.

The incident happened on July 7<sup>th</sup>, 2023 at Kroger located at 2875 north Decatur rd.

Venue as to Defendant's CSC OF Cobb County' Inc. and The Kroger Co. is proper in Cobb County, Georgia

4.

# The Plantiffs' Claim And Resolution

We were sitting (Mr. Lorenzo Clement and Ken Morton) in the Starbucks area at approximately 9:25 pm. We were approached by a manager whom greeted us in a friendly manner. Thirty minutes later the same manager Lewis returned with a security officer only to violate our rights with racial profiling. That resulted in the Dekalb county police being called out and we were unlawfully detained. Being detained illegally could have caused this matter to become physical which is what the manager stated. The manager then informed us that he came for confrontation knowing that it was two of us involved. He was proven wrong after a receipt was presented not only to him but to the officer who was on call. There was no probable cause not only to the officer but also to the manager as well. We were informed by Lewis (store manager) that it was best for the police be present to remedy these false allegations. Mr. Lewis (store manager) was under the Assumption that we stole items that we were consuming. We requested the video footage of the incident after we were detained along with an Apology.

These are the violations in which we were violated:

### A. RACIAL PROFILING

A PRIVATE PERSON SUBJECTED TO UNLAWFUL RACIAL PROFILING MAY SEEK REMEDIES UNDER 42 U.S.c.1983 SECTION 1983)

Which protects persons from the deprivation of any rights, privileges, or immunities secured by the Constitution and laws of the United States

Racial profiling or ethnic profiling is the act of suspecting, targeting or discriminating against a person on

The basis of their ethnicity, religion or nationality rather than on individual

The basis of their ethnicity, religion or nationality rather than on individual suspicion or available evidence.

We were two black men that he used as grounds for suspecting that we committed a crime

### **B. DETAINMENT**

Under Georgia Law, The tort of false imprisonment sometimes called false arrest of unlawful detention of someone, for any length of time, where the person is deprived of your physical liberty We requested Mr. Lewis (store manager) to provide us with his first and last name in which he refused. He also stated that he would not provide any information until he received a receipt from us nor would he release us.

C. ILLEGAL SEARCH AND SEIZURE

Is illegal under the fourth amendment. If it happens without consent, a warrant, or probable cause to believe a crime has been committed. There was no probable cause in being searched when a crime was not committed. There was no probable cause because Lewis security or surveillance did not see us pick up steal or pick anything up, nor did we leave the store or premises with anything, we were just sitting down at a table having a conversation about politics and consuming products that we purchased.

D. HARRASSMENT

is unwanted, uninvited, and unwelcome and causes nuisance, alarm, or substantial emotional distress without any legitimate purpose. He the (store manager Lewis) harassed us by aggressively demanding a receipt and assuming that we would be aggressive by bringing security to intimidate us.

REFERENCE NUMBER 58266757 14A23079 RC43-0001

LORENZO ERIC CLEMENT

**ADDRESS** 

DATE

TIME

## **CONCLUSION**

Wherefore the plaintiff's, Lorenzo E. Clement and Ken Morton, pray for the granting of the instant civil action complaint for racial profiling against the Kroger Co. and award damages in the amount of the following:

- \$1.25 Million Each
- \$1.25 Million Each
- \$2.5 Million
  - 1. Emotional distress, trauma
  - 2. Present/Future
  - 3. Psychologically, mentally, financially, and physically

4. Anger, paranoid, depression

Respectfully Submitted,

Lorenza E. Clement

Ken Morton

Sworn to and subscribed before me this

3 day of 10 1,20 2

Sworn to and subscribed / 2 before me this

\_day of <u>X/oU</u>,20<u>2</u>3

HERNO 64-2025

EXPIRES GEORGIA

ONG COUNTY

Certificate Of Service

This is to certify that and true and correct copy of the instant civil action upon the following parties herein on this 13 day of November, 2023, by filing with the clerk of courts of Cobb County Superior Court's office

Clerk of court Cobb County Superior Court 736 Whitlock Avenue NW Marietta, Ga 30064

Sworn to and subscribed before me this

Sharlynn Herrdon Jofary 6-4-2025

ALICA COUNTING

Hood Clayton Logistics LLC 1014 Vine St The Kroger Co., Cincinnati, Oh 4520-1100 USA

Respectfully Submitted,

Lorenzo E. Clement

Ken Morton

Sworn to and subscribed before me this day of Nov 2022

64-2025